

**EXHIBIT B**

**To**

**Notice of Removal -**

**Declaration of Mary Udivich**

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MISSOURI  
KANSAS CITY DIVISION**

ELIZABETH MARTIN,	)	
	)	
Plaintiff,	)	Case No. ____
	)	
v.	)	Removed from Jackson County Circuit
	)	Court, Case No. 2316-CV16402
	)	
UNION HOME MORTGAGE CORP.,	)	
	)	
Defendant.	)	

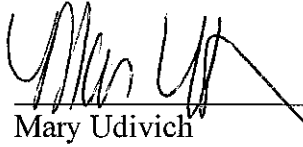
**DECLARATION OF MARY UDIVICH**

The undersigned declares and states as follows:

1. I, Mary Udivich, am over eighteen (18) years of age and have personal knowledge of the facts set forth in this declaration and, if called as a witness, could and would testify competently to these facts under oath.
2. I am a Human Resource Manager for Union Home Mortgage. In this position, I have knowledge of employee compensation and I have access to Union Home Mortgage's business records regarding employee compensation.
3. Union Home Mortgage is incorporated in Ohio and its principal place of business is in Strongsville, Ohio.
4. I have reviewed personnel data and records pertaining to former employee Elizabeth Martin ("Martin").
5. At the time of her August 11, 2022 separation from Union Home Mortgage, Martin earned \$17.00 per hour, which is equivalent to \$35,360.00 annually.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct as I verily believe.

Executed July 18, 2023

  
\_\_\_\_\_  
Mary Udivich